

| 1 | | The Honorable Marsha J. Pechma | |
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| 8 | UNITED STATES DISTRICT COURT | | |
| 9 | WESTERN DISTRICT OF WASHINGTON | | |
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| 11 | JULIE DALESSIO, an individual, | No. 2:17-cv-00642-MJP | |
| 12 | Plaintiff, | STIPULATED MOTION TO EXTEND DISCOVERY DEADLINES | |
| 13 | v. | DISCOVERT DEADLINES | |
| 14 | UNIVERSITY OF WASHINGTON, a Washington Public Corporation; Eliza Saunders, Director of the Office of Public Records, in her personal and official capacity; Alison Swenson, Compliance Analyst, in her personal capacity; Perry Tapper, Public Records Compliance Officer, in his personal capacity; Andrew Palmer, Compliance Analyst, in his personal capacity; John or Jane Does 1-12, in his or her personal capacity, | | |
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| 1617 | | NOTE ON MOTION CALENDAR November 02, 2018 | |
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| 21 | Defendants. | | |
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| 23 | Both parties move this Court to exten | d the discovery deadlines, as they have become | |
| 24 | impracticable to meet. | | |
| 25 | - | ated to discovery is November 07, 2018. Dkt. 96. | |
| 26 | Defendants amended their answer to the complaint last on September 21, 2018 adding two new | | |
| 27 | affirmative defenses of discretionary immunity and good faith immunity. Dkt. 107. | | |
| 28 | Stipulated Motion Extending Discovery Case 2:17-cv-00642 | 1 Law Office of Joseph Thomas 14625 SE 176 th St., Apt. N101 Renton, Washington Phone (206)390-8848 | |

Case 2:17-cv-00642-MJP Document 123 Filed 11/02/18 Page 2 of 3

| 1 | Plaintiff's motion to compel initial disclosures [Dkt. 108] is noted for hearing October 26, 2018 |
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| 2 | and Defendants' pending motion for summary judgment is noted for hearing November 16, 2018 |
| 3 | Dkt. 119. |
| 4 | Due to the current posture of this case with multiple pending motions, including a |
| 5 | dispositive motion filed by Defendants, the discovery deadlines have become impracticable to |
| 6 | meet. Both parties ask this Court to extend the deadline for all motions related to discovery from |
| 7 | November 07, 2018 to January 07, 2019. Both parties ask this Court to extend the deadline for |
| 8 | completing discovery from December 07, 2018 to February 07, 2019. |
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| 10 | Respectfully submitted this November 02, 2018, |
| 11 | |
| 12 | LAW OFFICE OF JOSEPH THOMAS, PLLC |
| 13 | |
| 14 | By: /s/ Joseph Thomas Joseph Thomas, WSBA #49532 |
| 15 | Attorney for Plaintiff |
| 16 | 14625 SE 176 th St., Apt. N101 Renton, WA 98058 |
| 17 | Phone: (206) 390-8848 Email: joe@joethomas.org |
| 18 | |
| 19 | KEATING, BUCKLIN & McCORMACK, INC., P.S. |
| 20 | |
| 21 | By: /s/ Jayne L. Freeman Jayne L. Freeman, WSBA #24318 |
| 22 | Special Assistant Attorney General for Defendant |
| 23 | 801 Second Avenue, Suite 1210 Seattle, WA 98104-1518 |
| 24 | Phone: (206) 623-8861 Fax: (206) 223-9423 |
| 25 | Email: jfreeman@kbmlawyers.com |
| 26 | |
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| 28 | Stimulated Motion Extending Discovery 2 Law Office of Joseph Thomas |

| 1 | Certificate of Service |
|----|--|
| 2 | I hereby certify that on 02 of November, 2018, I filed the foregoing with the Clerk of the |
| 3 | Court through the CM/ECF system which will automatically send electronic mail notification of |
| 4 | such filing to the CM/ECF registered participants as identified on the Electronic Email Notice |
| 5 | List. |
| 6 | <u>/s/ Joseph Thomas</u> Joseph Thomas, WSBA 49532 |
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| 28 | Stimulated Motion Extending Discovery 2 Law Office of Joseph Thomas |